Comments on texts resulting from the Terrestrial Animal Health Code Commission Report – January 2005 Meeting Submitted by the United States of America

Guidelines for the Land Transport of Animals

General comments

The document requires Competent Authorities to do numerous things. In Article 1, these include: 1) establishing minimum standards for animal welfare, 2) setting standards for the competence of drivers, animal handlers and managers, 3) establishing an accreditation system or interaction method to implement the standards, and 4) monitoring and evaluating the use of veterinary medications. In Article 2, these include creating an independent body, accredited by the Competent Authority, to assess compliance of animal handlers and to issue certificates of competence. The United States does not agree that the Competent Authorities in the Member Countries should be performing those functions. Perhaps the activities may be performed by other groups/organizations in cooperation with the Competent Authorities.

Specific comments

Article 1 Responsibilities

We recommend that the ad hoc Group give further consideration to rewording or rewriting the proposed text included in Article 1, Responsibilities – The welfare of animals during their transport is the joint responsibility of all people involved. (The proposed text consists of the bulleted items numbers 1-4.

Suggested proposed text:

The roles of each of those responsible are defined below:

- Owners and managers of animals are responsible for the general health of the animals and their fitness for the *journey*, and their welfare during the *journey*, regardless of whether duties are subcontracted to other parties during *transport*. They are also responsible for ensuring compliance with any required veterinary or other certification, and for the presence during the *journey* of at least one *animal handler* competent for the species being transported, with the authority to take prompt action. They are also responsible for ensuring that equipment and veterinary assistance are provided as appropriate for the species and *journey*.
- Business agents or buying/selling agents have a joint responsibility with owners for the selection of animals that are fit to travel. They have a joint responsibility with market owners and managers of facilities at the start and at the end of the *journey* for the availability of suitable facilities for the assembly, *loading*, transport, unloading and holding of animals, and for emergencies.
- Animal handlers are responsible for the humane handling and care of the animals, especially during
 loading and unloading, and for maintaining a journey log. In the absence of a separate animal
 handler, the driver is the animal handler.
- Transport companies, vehicle owners and drivers are responsible for planning the journey to ensure the care of the animals:
 - o transport companies and vehicle owners are responsible for choosing appropriate vehicles and ensuring that properly trained staff are available for loading and earing for animals,
 - o transport companies and vehicle owners are responsible for developing and keeping up to date contingency plans to address emergencies and minimise stress during transport,
 - o transport companies and vehicle owners are responsible for producing a journey plan which includes a loading plan, journey duration and location of resting places,

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odrivers are responsible for loading only those animals which are fit to travel, for their correct loading into the vehicle and their inspection during the journey, and for appropriate responses to problems arising.

Owners and managers are responsible for the general health of the animals and their fitness for the journey and for ensuring a statement of compliance is in place signed by the Business Agent or Buying/Selling Agent and/or Transporter regarding the presence of properly trained animal handler(s) sufficient to safely load and unload animals during transport as necessary and at the final destination. The person or entity that accepts the animals for transport (Business Agent or Buying/Selling Agent or Transporter) is responsible for paying the costs associated with the animal handler(s) and driver(s). The journey will be planned by the party having responsibility for that segment of the journey, and will assume all consequences of error. When the animals are delivered and unloaded at the final destination, the accepting party then assumes welfare, financial, and other responsibilities for the animals.

Comment/Rationale:

It is not specifically stated, but the implication is that the owner and managers of the animals are responsible for paying for the presence during the journey of at least one animal handler, and for "ensuring that equipment and veterinary assistance are provided...; then the business agents or buying selling agents have joint responsibility...for the assembly, loading, transport, unloading and holding of animals..."

At the same time the animal handlers are responsible for the "...loading and unloading and for maintaining a journey log." And, if there is no separate animal handler, the Driver is the animal handler. This is confusing because no clear chain of command or responsibility is provided, nor is it stated who will pay for these activities. These sections need to be clarified to avoid multiple interpretations and potential conflict during trade. In addition, since often the farmers are owners of the animals, they cannot also be expected, particularly small scale farmers, to be responsible for payment and other transport obligations. There does not appear to be a specific individual identified as having ultimate responsibility for the welfare of the animals during land transportation.

Article 3 Planning the journey Space allowance

Suggested proposed text:

Bullet 3: When animals lie down, they should all be able to adopt a comfortable normal lying posture without being injured and which allows necessary thermoregulation.

Comment/Rationale:

The comfort of an animal is subjective. However, the animal should not be injured when it adopts a normal lying posture.

Suggested proposed text:

Bullet 4: When animals are standing, they should have sufficient space to adopt a balanced position without body contact with other animals. as is appropriate fpr the climate and apices transported (Appendix XXX)

Comment/Rationale:

Excessive space for animals can be as detrimental as insufficient space. The amount of space an animal may require during land transport will vary with its species, age, sex and breed as well as the other factors including climatic conditions. Some species of animals acquire fewer injuries in transit when there is another animal(s) to help maintain balance.

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Rest, water and feed

Suggested proposed text:

Bullet 1: There should be planning for the availability of suitable water and feed during the journey. Feed should be of appropriate quality and composition for the species, age condition of the animals, climatic conditions etc.

There should be planning for the availability of suitable water and feed as appropriate and needed for the species, age, and condition of the animals, as well as the duration of the journey, climatic conditions etc.

Comment/Rationale:

Water and feed are not always required during the journey. To determine if there is a need for feed and water during land transportation of animals, one should also take into consideration the duration of the journey. Animals may not need feed and water for journeys of short duration.

Article 5

Pre-journey period Fitness to travel

Suggested proposed text:

Bullet 3: Animals that are unfit to travel include:

Sub-bullet 1: those that are sick, injured, weak, disabled, fatigued or emaciated.

Comment/Rationale:

One of the most important issues for consideration when addressing the welfare of animals during transportation is not to transport unfit animals. It is very difficult to assure good animal welfare during transport if the animals are not fit. However, animals that are unfit for routine transport, such as the severely lame, injured, emaciated or disabled, may be transported using specialized equipment and techniques etc. by individuals appropriately trained as indicated.

Article 6

Loading

Goads and other aids

Bullet 1: The following principles should apply:

Suggested proposed text:

Sub-bullet 6:

The throwing or dropping of animals, or their lifting or dragging by their tail, head, horns, ears, limbs, wool, hair or feathers should not be permitted <u>unless in an emergency situation that, if prolonged, could result in injury or pain.</u> The manual lifting of small animals is permissible.

Comment/Rationale:

Emergencies may occur during the transportation process that require an animal be dragged or moved by its limbs etc. in order to quickly remove it from a situation that is dangerous or compromises its welfare.

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Article 7

Travel

Sick, injured and dead animals

Suggested proposed text:

Bullet 4: In order to reduce the likelihood that animal transport will increase the spread of infectious disease, contact between transported animals, or the <u>waste</u> products of the transported animals, and other farm animals should be minimized.

Comment/rationale:

It appears that the intent of the text is to describe situations that will prevent the spread of infectious disease between live animals that are in transit and those that are on the farm. Live animals produce waste products, which may be a source of infectious disease; therefore, the word waste should be added to the text to ensure the reader comprehends the intent of the guideline.

Suggested proposed text:

Bullet 6: When euthanasia is necessary, the driver or animal handler should ensure that it is carried out humanely, and results in immediate. When necessary, Assistance should be sought from a veterinarian or other person(s) competent in euthanasia procedures. Recommendations for specific species are described in the Chapter on humane killing of animals for disease control purposes.

Comment/Rationale:

The use of the words "when necessary" in the proposed text implies that there are situations when the assistance of a veterinarian or person competent in euthanasia procedures is not needed. If euthanasia is required, then it should be necessary to have someone present that is competent to perform the task humanely.

Article 8

Unloading and post-journey handling Cleaning and disinfection

Suggested proposed text:

Bullet 1: Vehicles, crates, containers, etc. used to carry the animals should be cleaned before re-use through the physical removal of manure and bedding by scraping, washing and flushing vehicles and containers with water and detergent. This should be followed by disinfection when there are concerns about disease transmission.

Comment/Rationale:

Disease control should always be an issue of concern when considering the welfare of animals. Diseases can be transmitted by animals that are asymptomatic; consequently, it is good basic husbandry to disinfect vehicles, crates, containers etc. after they have been cleaned and before they are used to carry other animals.